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12	Attorneys for General Electric Capital Corporation			
13	IN THE UNITED STATES BANKRUPTCY COURT			
14				
15	EASTERN DISTRICT OF WASHINGTON			
16	In re	Chapter 11		
17	CENTURION PROPERTIES III, LLC	Case No. 10-0402	4-FLK 11	
18	Debtor and Debtor-in-Possession.		CTRIC CAPITAL N'S MOTION TO	
19	Debtor and Debtor-III-1 ossession.	COMPEL DEBT ENTRY UPON I	OR TO PERMIT	
20			May 17, 2011	
21		Hearing Date: Heating Time: Location:	1:00 p.m. Telephonic (509) 353-3192	
22		Location.	(509) 353-3192	
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LOS ANGELES

GENERAL ELECTRIC CAPITAL CORPORATION'S MOTION TO COMPEL DEBTOR TO PERMIT ENTRY UPON LAND

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## TO THE HONORABLE FRANK L. KURTZ, UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR, THE OFFICE OF THE UNITED STATES TRUSTEE, AND OTHER PARTIES IN INTEREST:

General Electric Capital Corporation ("GECC"), by and through its undersigned counsel, hereby moves (this "Motion") the above-captioned Court for an order compelling the Debtor to permit entry upon land in accordance with GECC's First Request for Entry Upon Land (the "Request"), served on the Debtor on May 11, 2011.

This Motion is based on the Notice of Motion, the Memorandum of Points and Authorities in support hereof, and the Declaration of David B. Levant in support of the Motion, all filed concurrently herewith, as well as all pleadings, records, and files in this action, and upon further evidence and argument as may be submitted at or before the hearing on this Motion.

As set forth more fully in the accompanying Memorandum of Points and Authorities, an order compelling the Debtor to permit GECC's anticipated expert to conduct a brief physical inspection of the Battelle Memorial Institute Campus is necessary to permit him sufficient opportunity to develop his opinions and prepare his report.

Therefore, through this Motion, GECC seeks an order compelling the Debtor to permit entry upon land in accordance with GECC's Request.

DATED: May 16, 2011

Respectfully submitted,

3 STOEL RIVES LLP

By: /s/ David B. Levant
David B. Levant, WSBA No. 20528

David B. Levant, WSBA No. 20528 Erin L. Eliasen, WSBA No. 37606

and

Primary Counsel: LATHAM & WATKINS LLP (Please Contact Peter M. Gilhuly (admitted pro hac vice)

GENERAL ELECTRIC CAPITAL CORPORATION'S MOTION
TO COMPEL DEBTOR TO PERMIT ENTRY UPON LAND

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